

Association of Municipal Engineers (AME)

Great Lakes Water Authority - WRRF

9300 W. Jefferson, Room # 420

Detroit, MI 48209

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US BANKRUPTCY MIE-DET

October 26, 2017


Honorable Thomas J. Tucker
United States Bankruptcy Court
211 Fort Street
Detroit, MI 48226

RE: Case No. 13-53846

Hon. Judge Tucker:

Association of Municipal Engineers (AME) did not receive any Motion (see attached first page of the document) titled "MOTION OF THE GREAT LAKES WATER AUTHORITY AS SUCCESSOR IN INTEREST TO THE CITY OF DETROIT WATER AND SEWERAGE DEPARTMENT FOR ENTRY OF AN ORDER ENFORCING THE PLAN OF ADJUSTMENT INJUNCTION AND THE BAR DATE ORDER AGAINST THE ASSOCIATION OF MUNICIPAL ENGINEERS AND PARTHO GHOSH" as mentioned by Kilpatrick and Associates, P.C. that was filed on 9-28-2017 and AME to respond by 10-12-2017. AME came to know this filing when it was filed with MERC recently as an Exhibit.

Sincerely,



Partho Ghosh, MS, PE
President AME
Great Lakes Water Authority - WRRF
9300 W. Jefferson Avenue, Room # 420
Detroit, MI 48209

cc: Richardo I. Kilpatrick
Attorney for Detroit Water & Sewerage Dept.
Kilpatrick & associates P.C.
615 Griswold, Suite 1305
Detroit, MI 48226

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION – DETROIT

In re:

CITY OF DETROIT, MICHIGAN

Debtor.

Chapter 9

Hon. Thomas J. Tucker

Case No. 13-53846

**MOTION OF THE GREAT LAKES WATER AUTHORITY AS
SUCCESSOR IN INTEREST TO THE CITY OF DETROIT WATER AND
SEWERAGE DEPARTMENT FOR ENTRY OF AN ORDER ENFORCING
THE PLAN OF ADJUSTMENT INJUNCTION AND THE BAR DATE
ORDER AGAINST THE ASSOCIATION OF MUNICIPAL ENGINEERS
AND PARTHO GHOSH**

NOW COMES the Great Lakes Water Authority as successor in interest to the City of Detroit Water and Sewerage Department (“GLWA”), by and through its attorneys Kilpatrick & Associates, P.C., and for its Motion for Entry of an Order Enforcing the Plan of Adjustment Injunction and the Bar Date Order Against the Association of Municipal Engineers and Partho Ghosh states as follows:

I. Introduction

1. On February 21, 2014, the Association of Municipal Engineers (“AME”) and Partho Ghosh (“Mr. Ghosh”), AME’s President, timely filed its proof of claim pursuant to the Bar Date Order, asserting as the basis for its claim employee compensation and benefits for which it had filed a pre-petition grievance with the Michigan Bureau of Employment Relations Commission (“MERC”),